

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION**

IN RE:

Reagor-Dykes Motors, LP,
Reagor-Dykes Imports, LP,
Reagor-Dykes Amarillo, LP,
Reagor-Dykes Auto Company, LP,
Reagor-Dykes Plainview, LP, and
Reagor-Dykes Floydada, LP,
Reagor Auto Mall, Ltd.,
Reagor-Dykes Snyder, L.P.,
Reagor-Dykes Auto Mall I LLC,
Reagor-Dykes II LLC,
Reagor-Dykes III LLC,

Case No. 18-50214-rlj-11
Jointly Administered

Debtors,

Dennis Faulkner, Creditors' Trustee,

Plaintiff,

Adversary No. 20-05005-rlj

vs.

Ford Motor Credit Company LLC,

Defendant.

**DEFENDANT FORD MOTOR CREDIT COMPANY LLC'S MOTION
FOR SETTING AND REQUEST FOR EXPEDITED HEARING**

By this motion, Defendant Ford Motor Credit Company LLC ("Ford Credit") respectfully requests an Order: (1) setting an expedited hearing on its Motion to Quash, in Part, Motion for Protective Order, in Part, and Objections to Creditors' Trustee Dennis Faulkner's Third-Party Subpoenas (the "Motion") (Dkt. 237); and (2) scheduling a hearing on the Motion.

As set forth fully in the Motion, Ford Credit seeks an Order: quashing or, in the alternative, narrowing the scope of Creditors' Trustee Dennis Faulkner's (the "Trustee") Subpoenas to third parties Linda Lundy, Rick Dykes, and Shane Smith.

In consultation with the Court's staff, Ford Credit was advised that the Court is available for a hearing to address the Motion on Wednesday, March 23, 2022, at 2:30 p.m.

The Trustee has advised that he does not oppose this motion for expedited hearing.

WHEREFORE, Ford Credit respectfully requests that the Court grant this motion and set the Motion for an expedited hearing on Wednesday, March 23, 2022, at 2:30 p.m.

Dated: March 8, 2022

Respectfully submitted,

BAKER BOTTS L.L.P.

By: /s/ Kevin M. Sadler

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*ATTORNEYS FOR DEFENDANT
FORD MOTOR CREDIT COMPANY LLC*

CERTIFICATE OF CONFERENCE

Ford Credit, through counsel, conferred with the Trustee on March 8, 2022 regarding this motion. The Trustee indicated that he was not opposed to the motion.

/s/ Kevin M. Sadler
Kevin M. Sadler, Esq.

CERTIFICATE OF SERVICE

I hereby certify that on March 8, 2022, a copy of the foregoing Motion was filed electronically. Notice of this filing will be sent to all parties through the Court's Electronic Case Filing System ("ECF"). Parties may access this filing through ECF.

/s/ Kevin M. Sadler
Kevin M. Sadler, Esq.